



UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
HARISH SINGH SIDHU,  
aka "Harry Sidhu,"  
  
Defendant.

No. 8:23-cr-00114-JWH

I N F O R M A T I O N

[18 U.S.C. § 1519: Obstruction of  
Justice; 18 U.S.C. § 1343: Wire  
Fraud; 18 U.S.C. § 1001: False  
Statements]

The United States Attorney charges:

INTRODUCTORY ALLEGATIONS

At times relevant to this Information:

1. Defendant HARISH SINGH SIDHU, also known as "Harry Sidhu," was a public elected official for the City of Anaheim. SIDHU was first elected as a member of the Anaheim City Council in or around 2004 and was elected as Mayor of the City of Anaheim in 2018.
2. The City of Anaheim was a local government in Orange County, California, within the Central District of California.
3. The Los Angeles Professional Sports team ("Team") was located in the City of Anaheim. Since the 1960s, the Team has played

1 home games at a Stadium in Anaheim, California (the "Stadium"). The  
2 Team itself has been privately owned by several entities and  
3 individuals throughout the years, most recently, a private  
4 individual.

5 4. The Stadium and the land on which it is located was owned  
6 by the City of Anaheim.

7 5. Beginning in or around 2019, the City of Anaheim was  
8 engaged in negotiations with the Team to sell the Stadium to a  
9 company ("the Purchaser").

10 6. These Introductory Allegations are incorporated into all  
11 Counts of this Information.

COUNT ONE

[18 U.S.C. § 1519]

7. On an unknown date after July 21, 2020, and no later than in or around July 2022, in Orange County, within the Central District of California, defendant HARISH SINGH SIDHU, also known as "Harry Sidhu," knowingly destroyed email messages, including an email message sent by defendant SIDHU entitled "Key Issues - Stadium Transaction Agreement.docx", with the intent to impede, obstruct, and influence the investigation and proper administration of a matter within the jurisdiction of the Federal Bureau of Investigation, a department or agency of the United States, and in relation to and in contemplation of any such matter.

COUNT TWO

[18 U.S.C. § 1343]

A. THE SCHEME TO DEFRAUD

7. Beginning no later than in or around October 2020, and continuing through at least in or around November 2020, in Orange County, within the Central District of California, and elsewhere, defendant HARISH SINGH SIDHU, also known as "Harry Sidhu," together with others known and unknown to the United States Attorney, knowingly and with intent to defraud, devised, participated in, and executed a scheme to defraud and obtain money from the State of California by means of materially false and fraudulent pretenses, representations, and promises, and material omissions of facts, by transmitting and causing the transmission of email messages, by means of wire communications in interstate commerce, for the purpose of executing such scheme.

8. The scheme to defraud operated, in substance, as follows:

a. While defendant SIDHU was mayor of the City of Anaheim, defendant SIDHU obtained a mailing address in Arizona of an Anaheim businessperson ("the Arizona address").

b. Defendant SIDHU used that Arizona mailing address to register a helicopter he had bought for himself in October 2020 for approximately \$205,000, even though defendant SIDHU did not actually live at or otherwise use the Arizona address, so that defendant SIDHU could avoid paying California's 7.75% sales/use tax applicable to the purchase price of the helicopter.

c. Defendant SIDHU would falsely represent the Arizona address as his mailing address on a Federal Aviation Administration ("FAA") Form 8040-1, "Aircraft Registration Application," and a FAA

1 Form 8050-2, "Aircraft Bill of Sale," for the helicopter, which  
2 defendant SIDHU signed and certified as true, when in fact, his  
3 mailing address was in California and the helicopter was hangared in  
4 California, and not Arizona.

5 B. THE USE OF AN INTERSTATE WIRE

6 9. On or about November 2, 2020, within the Central District  
7 of California, and elsewhere, for the purpose of executing the scheme  
8 to defraud described above, defendant SIDHU caused the transmission,  
9 by means of wire communication in interstate commerce, of an email  
10 message entitled "R44 Listing # 1140G (SN 10277 / N277MC) - Buyer's  
11 Closing Documents," sent from the State of Florida by defendant  
12 SIDHU's broker for the helicopter purchase to a title company in the  
13 State of Oklahoma, instructing that the helicopter be registered at  
14 the Arizona address.

COUNT THREE

[18 U.S.C. § 1001(a)(2)]

10. On or about November 10, 2020, in Orange County, within the Central District of California, in a matter within the jurisdiction of the executive branch of the Government of the United States, specifically, the Federal Aviation Administration ("FAA") and the United States Department of Transportation, defendant HARISH SINGH SIDHU, also known as "Harry Sidhu," willfully and knowingly made materially false, fictitious, and fraudulent statements and representations on a FAA Form 8040-1, "Aircraft Registration Application," and on a FAA Form 8050-2, "Aircraft Bill of Sale," in that defendant SIDHU falsely stated and represented that his permanent mailing address was in Scottsdale, Arizona, when, in fact, as defendant SIDHU then knew, his permanent mailing address was in Anaheim, California.

COUNT FOUR

[18 U.S.C. § 1001(a)(2)]

11. On or about May 12, 2022, in Orange County, within the Central District of California, in a matter within the jurisdiction of the executive branch of the Government of the United States, specifically, the Federal Bureau of Investigation ("FBI"), defendant HARISH SINGH SIDHU, also known as "Harry Sidhu," knowingly and willfully made the following materially false, fictitious, and fraudulent statements and representations in an interview with FBI special agents:

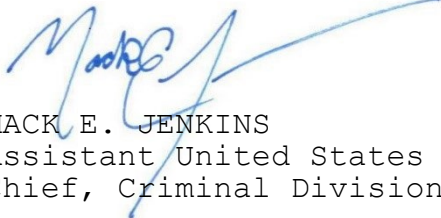
a. Defendant SIDHU falsely stated that he did not expect to receive any kind of benefit from the Purchaser in exchange for the successful completion of the sale of the Stadium to the Purchaser. In fact, as defendant SIDHU then knew, defendant SIDHU was expecting that the Purchaser would donate \$1 million to a political action committee supporting defendant SIDHU's re-election as Anaheim City Mayor in exchange for the successful completion of the Stadium sale to the Purchaser.

b. Defendant SIDHU falsely denied that he ever provided confidential information belonging to the City of Anaheim to the Purchaser to benefit the Purchaser in negotiations for the purchase of the Stadium. In fact, as defendant SIDHU knew, on or about July 21, 2020, defendant SIDHU sent an email from his personal email account to the Purchaser via an intermediary co-schemer entitled "Key Issues - Stadium Transaction Agreement.docx," which included an attachment that contained confidential attorney-client privileged communications and confidential negotiation information related to

1 the potential sale of the Stadium, including discussion of issues  
2 related to price and other terms of the sale.

3 c. Defendant SIDHU falsely stated that he did not use his  
4 personal email account to conduct City of Anaheim business. In fact,  
5 as defendant SIDHU then knew, defendant SIDHU had used his personal  
6 email account to send and receive many messages to conduct City of  
7 Anaheim business.

8 JOSEPH T. MCNALLY  
9 United States Attorney,  
10 Acting Under Authority Conferred  
11 by 28 U.S.C. § 515

12   
13 MACK E. JENKINS  
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